

How to Develop a Written Personnel Training Plan

Dangerous Waste Training Regulations for large quantity generators (LQGs),
WAC 173-303-330

Step 1: Identify positions that handle dangerous waste and records.

Include those positions that:

- Add or remove waste from containers.
- Operate a recycling still or wastewater treatment unit.
- Perform treatment by generator (TBG) activities (e.g., neutralization, evaporation).
- Transfer waste from one area or container to another.
- Inspect dangerous waste accumulation areas.
- Label containers.
- Prepare waste for transport.
- Track and manage manifest records or training records.

Step 2: Write a job description for each position identified.

Include the dangerous waste (DW) activities performed.

Sample job descriptions:

Job Title: Administrative Assistant

Name: Alex Brown

Job Description: Tracks and manages manifests. Keeps records, including manifests and personnel training plans and records, available for review for five years. Updates the Contingency Plan annually, including the site emergency contact information and evacuation map.

Job Title: Shop Manager

Name: Chris Smith

Job Description: Marks the accumulation start date on full drums of DW and transfers them from the satellite accumulation area to the final 90-day accumulation area in preparation for pick up. Calls the DW hauler to schedule waste pick up. Signs the manifests. Provides annual DW training to employees. Performs and documents weekly DW accumulation area inspections and general facility inspections. Completes the Dangerous Waste Annual Report.

Job Title: Shop Assistant

Name: Kelly Jones

Job Description: Prepares and labels DW satellite accumulation area drums with DW and risk labels. Adds or removes DW from containers. Operates a solvent recycling still and records activities on a still log. Performs TBG activities (e.g., neutralization, evaporation) and records batches in TBG log. Informs Shop Manager (Chris Smith) when satellite containers are full. Fills in for Shop Manager as needed to perform weekly area inspections.

If you need a format for the visually impaired, call the Hazardous Waste and Toxics Reduction Program at 360-407-6700. Persons with hearing loss may call 711 for Washington Relay Service. Persons with a speech disability, call 877-833-6341.

Step 3 Identify training levels.

Identify the relevant training needs for each position. If needed, use more than one training level.

Level One

Employees with minimal contact with DW or records. For example:

- Administrative assistants
- Fork lift operators
- Touch-up painters

Positions whose jobs require:

- Adding waste to containers.
- Maintaining copies of records for five years.
- Updating emergency contact information and evacuation maps.

Level Two

Employees who supervise Level One workers and/or employees with extensive contact with DW. For example:

- | | |
|------------------------|------------------------------|
| • Shop assistant | • Mechanics |
| • Paint gun operators | • Solvent still operators |
| • Machinists | • Evaporation unit operators |
| • Plating line workers | • TBG operators |
| • Silk-screen washers | |

Positions whose jobs require:

- Access to satellite accumulation areas.
- Transferring of wastes from satellite accumulation areas to final accumulation areas.
- Properly labeling DW containers, used oil containers, spent antifreeze containers, used shop rag containers, and universal waste containers for bulbs and batteries.
- Operating a solvent still or wastewater treatment unit.
- Performing TBG activities.
- Filling out and signing manifests.

Level Three

Employees who supervise Level Two workers and/or would respond to a hazardous materials emergency. For example:

- Shop manager
- Environmental health and safety managers
- Emergency responders/coordinators
- Supervisors of areas that generate hazardous wastes

Positions whose jobs require:

- Inspecting accumulation areas and emergency response equipment.
- Response to spills and emergencies and oversight on cleanup.
- Training new employees.



Step 4: Write training elements for each level.

Sample training levels and elements:

Level One:

- Employees understand that all DW, universal waste, spent antifreeze, and used oil containers are to be kept closed except when adding or removing wastes.
- Employees are familiar with emergency equipment and emergency procedures.
- Employees understand record keeping requirements for manifests, training records, waste profiles, and waste designation records.

Level Two:

- Everything in Level One.
- Employees understand that satellite accumulation containers must be marked with the accumulation start date on the date that the accumulation area reaches 55 gallons.
- Employees understand that when a satellite accumulation area reaches 55 gallons, the waste container must be dated and transferred to the final accumulation area within three days.
- Employees understand that containers holding DW must be labeled or marked with the words “Hazardous Waste” or “Dangerous Waste,” the major health risk associated with the waste (for example, “toxic” or “flammable,” etc.), and the accumulation start date (except for the satellite accumulation containers).
- Employees understand that LQGs of DW have 90 days from the accumulation start date to ship waste off-site.
- Employees understand that the amounts of solvent recycled must be recorded in a solvent still recycling log, and that all other container management requirements apply (for example, label accumulated solvent as DW prior to distillation, keep solvent containers closed).
- Employees performing treatment by generator (TBG) activities understand that they must maintain a log showing the date and amount of waste treated, and that all other container management requirements apply.

Level Three:

- Everything in Level One and Level Two.
- Employees understand that weekly inspections of the final accumulation area must be done and any problems must be noted on the inspection log, including the date and actions taken to correct the problem.
- Employees understand that emergency response equipment must be inspected regularly.
- Employees know where the emergency response equipment is kept and how to use it.

Step 5: Develop training outline.

Sample training outline:

Hazardous Waste Container Management

- Keep containers closed except when adding or removing waste.
 - Locking-type funnels are locked and secured to the drums.
 - Remove non-locking funnels after adding or removing waste.
 - Securely fasten ring locks.



- Separate rows of containers by 30 inches of aisle space.
- Check that containers are in good condition, such as free of rusts, dents, and leaks.
- Keep secondary containment around containers in good condition and free of standing liquids.

Labeling

- Label or mark containers as “Hazardous Waste” or “Dangerous Waste.”
- Label or mark the major risk on the containers (for example, “Flammable,” “Corrosive,” or “Toxic”).

Satellite Accumulation

- Know the location of satellite accumulation area(s).
- Know who the designated operators are for each satellite accumulation area.
- The designated operator(s) must:
 - Ensure no more than 55 gallons per waste stream accumulates in the satellite area(s).
 - Ensure satellite accumulation containers have “Hazardous Waste” or “Dangerous Waste” labels.
 - Ensure satellite accumulation containers have major risk (i.e., “Flammable,” “Corrosive,” or “Toxic” labels or markings.)
 - Immediately date container(s) with the accumulation start date when the satellite area reaches 55 gallons.
 - Move the container(s) to the final accumulation area within three days of reaching 55 gallons.

Accumulation Start Dates

- Label all non-satellite containers with the date waste first started accumulating in the container.
- Date satellite containers when full (or amount of the waste stream accumulated in the area reaches 55 gallons).
- Ship the waste off-site to a permitted hazardous waste facility within 90 days.
- Call vendor to schedule a pick up when the date on the container shows that the waste has been on-site for 80 days and is approaching the 90-day mark.

Weekly Inspections

- Conduct weekly inspections of the final accumulation areas.
- Log weekly accumulation area inspections.
- Note problems and any actions taken to correct problems on the log along with the date of the corrections.
- Inspect emergency response equipment and spill kits to ensure that the necessary supplies are available and still viable.
- Keep copies of the weekly inspection logs for a minimum of five years.

Step 6: Deliver training and keep training records. See next page for a sample employee training record.



Sample Training Record

Name: _____

Job Title: _____

Hire Date: _____

Job Description: _____

☐ Initial DW Training

☐ Annual DW Refresher

The above employee has received the following DW training appropriate to the job description. Check all boxes that apply:

- ☐ I understand that all DW containers are to be kept closed except when adding or removing wastes.
- ☐ I understand that the DW satellite accumulation container(s) need to be dated on the date that the area reaches 55 gallons.
- ☐ I understand that when the satellite accumulation area reaches 55 gallons total, the container(s) must be dated and transferred to the final 90-day accumulation area within three days.
- ☐ I understand that containers holding DW must be labeled or marked with the words "Hazardous Waste" or "Dangerous Waste," the major health risk associated with the waste, and excluding satellite containers, the accumulation start date.
- ☐ I understand that my company is an LQG of DW and has 90 days to ship waste off-site.
- ☐ I understand that I am to conduct weekly inspections of the final 90-day accumulation area and note any problems on the weekly inspection log, along with the date and nature of any corrective measures taken.
- ☐ I know where the emergency response equipment is kept and how to use it.

Supervisor/Trainer Signature

Date

Employee Signature

Date

